



Surfrider Foundation

March 1, 2007

Mr. Stuart A. Richards, Deputy Director
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Richards:

The Surfrider Foundation is a non-profit environmental organization dedicated to the protection of the world's oceans, waves and beaches. We remain deeply concerned with the ongoing ocean disposal of tritium-contaminated groundwater collected during the decommissioning process of San Onofre Nuclear Generating Station (SONGS) generator 1. Southern California Edison (SCE) has been unable to quantify the size, nature or source of the tainted water plume or whether this water is migrating into nearshore waters via subsurface pathways. Nor have they shown sufficient evidence that the continuing disposal of the water through both the offshore and beach outfalls are having no adverse effect on water enthusiasts at nearby San Onofre State Beach or on natural communities. This beach receives over 2.5 million visitors a year who deserve the highest level of protection from radioactive wastes. The continued reliance on infrequent, far offsite testing is inadequate for full protection of human health.

The fact that this contaminated water at Unit 1 went undetected for an unknown period of time that may have begun decades ago is disheartening when considering the scale of operation at Units 2 and 3. Current monitoring programs for groundwater, nearshore ocean waters and beaches are wholly inadequate and could allow the undetected release of radioactive contamination into heavily utilized recreational areas. The testing of nearby offsite drinking water wells does not satisfy the need for protection of surfers, swimmers, fishermen and beach users.

We feel that recent implementation of "voluntary" monitoring and reporting of groundwater contamination at reactor sites nationwide is insufficient. Monitoring must be mandatory to avoid the undetected release and subsequent subsurface transport of radionuclides that could lead to major impacts on human health as well as vast remediation and cleanup costs.

We request the cessation of all releases of tritiated groundwater through the ocean and beach outfalls as well as a full report on the nature and extent of the contaminated groundwater found at Unit 1. This should include a description of potential transport pathways towards the beach and nearshore waters as well as remediation efforts for these areas. Descriptions of the contaminated water as "brackish"

points to migration pathways with ocean waters that could lead to unintended releases directly within heavily utilized recreational resources.

We request that expanded and ongoing testing of groundwater contamination throughout the SONGS site be conducted to determine the full extent of leakage from all generators. Onsite groundwater testing should be mandatory for early detection of contamination as opposed to only testing at nearby offsite drinking water wells. These offsite wells are at such a distance that any detected contamination would signify that an extremely large release had occurred years prior and may still be ongoing. Monitoring from such a distance offsite is completely unacceptable and could lead to the creation of a major catastrophe and cleanup effort that could have been easily prevented. In addition, the proximity of the site to a heavily utilized recreational resource must preclude the use of offsite monitoring only.

We request expanded and ongoing testing of the beach and nearshore waters at sites both in the vicinity of Unit 1 and to the south of Units 2 and 3. Single tests of beach samples (as reported in NRC INSPECTION REPORT 050-00206/06-015) are inadequate moving forward considering the inability of SCE to determine the source and full extent of this most recent contamination incident.

Thank you for your attention to these matters. I look forward to your reply and action.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Rauscher', written in a cursive style.

Mark Rauscher

Assistant Environmental Director

Cc: Brian Katz, Vice President, Nuclear Oversight and Regulatory Affairs, SONGS
James Peterson, Regional Director, Senator Dianne Feinstein